

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

TNA AUSTRALIA PTY LIMITED and TNA  
NORTH AMERICA INC.,

Plaintiffs,

v.

PPM TECHNOLOGIES, LLC,

Defendant.

Case No. 3:17-CV-0642-M

JURY DEMANDED

**JOINT CLAIM CONSTRUCTION CHART**

Pursuant to the Court’s Order (Dkt. 50) and Paragraph 4-5(c) of Amended Miscellaneous Order No. 62, Plaintiffs TNA Australia Pty Limited and TNA North America Inc. (collectively referred to herein as “TNA”) and Defendant PPM Technologies, LLC’s (“PPM”) hereby submit the following Joint Claim Construction Chart with respect to the asserted claims of U.S. Patent No. 7,185,754 (“the ’754 Patent”), attached hereto as **Exhibit A**.

**I. Agreed Constructions**

At this this time, the parties have agreed upon the below constructions for the following claim terms in the ’754 Patent:

<b>Claim Term(s)</b>	<b>Agreed Construction</b>
“conveyor longitudinally extending surface” (Claims 6, 11, 16)	“longitudinally extending conveyor surface”
“linear conveyors” (Claims 4, 9, 14)	Plain and ordinary meaning (conveyor segment extending in a line)

## II. Disputed Claim Terms

The parties remain in dispute regarding the constructions for the following claim terms in the '754 Patent:

	<b>Claim Term(s)</b>	<b>TNA's Proposed Construction</b>	<b>PPM's Proposed Construction</b>
1	<p>"lateral displacement between the first segment downstream end relative to the second segment upstream end"</p> <p>(Claims 1, 6, 11, 16)</p>	<p>"sideways displacement between the first segment downstream end relative to the second segment upstream end"</p>	<p>"relative displacement between the first segment downstream end and the second segment upstream end in a sideways direction"</p> <p>"Lateral displacement" is understood to include movement by any number of means, where such lateral movement may be in combination with vertical movement<sup>1</sup></p>
2	<p>"relative displacement between the first segment downstream end and the second segment upstream end"</p> <p>(Claims 1, 6, 11, 16)</p>	<p>"sideways displacement between the first segment downstream end relative to the second segment upstream end"</p>	<p>"a change of one or both the position of the first segment and the second segment in relation to the other"</p>
3	<p>"with a further desired quantity of said items being removed from said conveyor as a result of relative displacement between the first segment downstream end and the second segment upstream end"</p> <p>(Claim 16)</p>	<p>No further construction needed, beyond construction of "relative displacement between the first segment downstream end and the second segment upstream end," as noted above</p>	<p>No further construction needed, beyond construction of "relative displacement between the first segment downstream end and the second segment upstream end," as noted above</p>

<sup>1</sup> As discussed in PPM's Responsive Claim Construction Brief, PPM's proposed construction for the disputed claim term "lateral displacement between the first segment downstream end relative to the second segment upstream end" has been modified since the filing of the parties' Joint Claim Construction Chart and Prehearing Statement (Dkt. 26). See Dkt. No. 55, at 2 n.2.

	<b>Claim Term(s)</b>	<b>TNA's Proposed Construction</b>	<b>PPM's Proposed Construction</b>
4	"upstream end"  (Claims 1, 6, 11, 16)	No construction needed	"a portion of the conveyor segment at, close to, or adjacent the point where items to be conveyed are introduced onto the conveyor segment"  "Upstream end" understood to optionally include an upstream edge.
5	"downstream end"  (Claims 1, 6, 11, 16)	No construction needed	"a portion of the conveyor segment at, close to, or adjacent the point where items to be conveyed leave the conveyor segment"  "Downstream end" understood to optionally include a downstream edge.
6	"transverse conveyor"  (Claims 1, 6, 11, 16)	"conveyor that is situated across the first slip and second slip conveyor segments such that it is not substantially parallel to the first slip conveyor segment and the second slip conveyor segment" <sup>2</sup>	"a conveyor arranged such that it extends across at an angle, not in line with, the longitudinal transport direction of the first conveyor segment or the second conveyor segment"  The term "transverse conveyor" includes offset or misaligned conveyors relative to the path of the first conveyor or second conveyor.

<sup>2</sup> As discussed in TNA's Opening Claim Construction Brief, TNA's proposed construction for the disputed claim term "transverse conveyor" has been modified since the filing of the parties' Joint Claim Construction Chart and Prehearing Statement (Dkt. 26). See Dkt. No. 52, at 20 n.8.

	<b>Claim Term(s)</b>	<b>TNA's Proposed Construction</b>	<b>PPM's Proposed Construction</b>
7	“positioned below”  (Claims 1, 6, 11, 16)	“positioned beneath”	“positioned lower than or beneath” <sup>3</sup>
8	“aligned position at which a desired quantity of said items pass from said first segment to said second segment”  (Claims 1, 6, 11)	No construction needed	“where the first segment and second segment are arranged in agreement or proper orientation to move items from the first segment to the second segment”  The term “aligned position” is not restricted to a parallel path.
9	“displaced position at which a further desired quantity of said items is removed from said conveyor as a result of relative displacement between the first segment downstream end and the second segment upstream end”  (Claims 1, 6, 11)	No further construction needed, beyond construction of “relative displacement,” as noted above	“a position in which the first segment is not aligned with the second segment due to a change of one or both the position of the first segment and the second segment in relation to one another so that items, some or all, are moved off of the path from the first conveyor segment to second conveyor segment” <sup>4</sup>

Pursuant to Paragraph 4-5(c) of Amended Miscellaneous Order No. 62, attached hereto as

**Exhibit A** is a Joint Claim Construction Chart with respect to the disputed terms.

<sup>3</sup> As discussed in PPM's Responsive Claim Construction Brief, PPM's proposed construction for the disputed claim term “positioned below” has been modified since the filing of the parties' Joint Claim Construction Chart and Prehearing Statement (Dkt. 26). *See* Dkt. No. 55, at 8.

<sup>4</sup> As discussed in PPM's Responsive Claim Construction Brief, PPM's proposed construction for the disputed claim term “displaced position at which a further desired quantity of said items is removed from said conveyor as a result of relative displacement between the first segment downstream end and the second segment upstream end” has been modified since the filing of the Joint Claim Construction Chart and Prehearing Statement (Dkt. 26). *See* Dkt. No. 55, at 13.

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Asserted Claims	TNA’s Proposed Construction	PPM’s Proposed Construction	Judge’s Construction
<p>1. A conveyor assembly including:</p> <p>a first slip conveyor segment having a longitudinally extending conveyor surface upon which items to be conveyed are longitudinally transported, the segment having an <b><i>upstream end</i></b> and a <b><i>downstream end</i></b>, the <b><i>upstream end</i></b> being provided to receive said item;</p> <p>a second slip conveyor segment, said second segment having a longitudinally extending conveyor surface upon which the items to be conveyed are longitudinally transported, the second segment having an <b><i>upstream end</i></b> and a <b><i>downstream end</i></b>, with said second segment being mounted relative to said first segment so that items leaving the first segment <b><i>downstream end</i></b> are delivered to the second segment <b><i>upstream end</i></b>,</p>	<p><b><i>“upstream end”:</i></b> No construction needed</p> <p><b><i>“downstream end”:</i></b> No construction needed</p> <p><b><i>“upstream end”:</i></b> No construction needed</p> <p><b><i>“downstream end”:</i></b> No construction needed</p>	<p><b><i>“upstream end”:</i></b> “a portion of the conveyor segment at, close to, or adjacent the point where items to be conveyed are introduced onto the conveyor segment”</p> <p>“Upstream end” understood to optionally include an upstream edge.</p> <p><b><i>“downstream end”:</i></b> “a portion of the conveyor segment at, close to, or adjacent the point where items to be conveyed leave the conveyor segment”</p> <p>“Downstream end” understood to optionally include a downstream edge.</p>	

Asserted Claims	TNA’s Proposed Construction	PPM’s Proposed Construction	Judge’s Construction
<p>said segments being mounted to provide for <i>lateral displacement between the first segment downstream end relative to the second segment upstream end</i> from an <i>aligned position at which a desired quantity of said items pass from said first segment to said second segment</i>, and a <i>displaced position at which a further desired quantity of said items is removed from said conveyor as a result of relative displacement between the first segment downstream end and the second segment upstream end</i>; and</p>	<p><b>“lateral displacement ...”:</b>  “sideways displacement between the first segment downstream end relative to the second segment upstream end”</p> <p><b>“aligned position ...”:</b>  No construction needed</p> <p><b>“displaced position ...”:</b>  No construction needed, beyond construction of “relative displacement”</p> <p><b>“relative displacement ...”:</b>  “sideways displacement between the first segment downstream end relative to the second segment upstream end”</p>	<p><b>“lateral displacement ...”:</b>  “relative displacement between the first segment downstream end and the second segment upstream end in a sideways direction”</p> <p>“Lateral displacement” is understood to include movement by any number of means, where such lateral movement may be in combination with vertical movement</p> <p><b>“aligned position ...”:</b>  “where the first segment and second segment are arranged in agreement or proper orientation to move items from the first segment to the second segment”</p> <p>The term “aligned position” is not restricted to a parallel path.</p> <p><b>“displaced position ...”:</b>  “a position in which the first segment is not aligned with the second segment due to a change of one or both the</p>	



Asserted Claims	TNA’s Proposed Construction	PPM’s Proposed Construction	Judge’s Construction
		<p>position of the first segment and the second segment in relation to one another so that items, some or all, are moved off of the path from the first conveyor segment to second conveyor segment”</p> <p><b>“relative displacement ...”:</b>  “a change of one or both the position of the first segment and the second segment in relation to the other”</p>	

Asserted Claims	TNA’s Proposed Construction	PPM’s Proposed Construction	Judge’s Construction
<p>a <i>transverse conveyor positioned below</i> said first segment <i>downstream end</i> and said second segment <i>upstream end</i> so that items leaving said first segment <i>downstream end</i> and not delivered to said second segment <i>upstream end</i> are delivered to said <i>transverse conveyor</i>.</p>	<p><b>“transverse conveyor”:</b>  “conveyor that is situated across the first slip and second slip conveyor segments such that it is not substantially parallel to the first slip conveyor segment and the second slip conveyor segment”</p> <p><b>“positioned below”:</b>  “positioned beneath”</p> <p><b>“upstream end”:</b>  No construction needed</p> <p><b>“downstream end”:</b>  No construction needed</p>	<p><b>“transverse conveyor”:</b>  “a conveyor arranged such that it extends across at an angle, not in line with, the longitudinal transport direction of the first conveyor segment or the second conveyor segment”</p> <p>The term “transverse conveyor” includes offset or misaligned conveyors relative to the path of the first conveyor or second conveyor.</p> <p><b>“positioned below”:</b>  “positioned lower than or beneath”</p> <p><b>“upstream end”:</b>  “a portion of the conveyor segment at, close to, or adjacent the point where items to be conveyed are introduced onto the conveyor segment”</p> <p>“Upstream end” understood to optionally include an upstream edge.</p>	

Asserted Claims	TNA's Proposed Construction	PPM's Proposed Construction	Judge's Construction
		<p><b><i>“downstream end”:</i></b> “a portion of the conveyor segment at, close to, or adjacent the point where items to be conveyed leave the conveyor segment”</p> <p>“Downstream end” understood to optionally include a downstream edge.</p>	

Asserted Claims	TNA’s Proposed Construction	PPM’s Proposed Construction	Judge’s Construction
<p>2. The conveyor assembly of claim 1, wherein both conveyor surfaces are upwardly facing, and at least one of said segments is mounted for angular movement to provide for relative angular movement between the first segment <i>downstream end</i> and the second segment <i>upstream end</i>.</p>	<p><b><i>“upstream end”:</i></b> No construction needed</p> <p><b><i>“downstream end”:</i></b> No construction needed</p>	<p><b><i>“upstream end”:</i></b> “a portion of the conveyor segment at, close to, or adjacent the point where items to be conveyed are introduced onto the conveyor segment”</p> <p>“Upstream end” understood to optionally include an upstream edge.</p> <p><b><i>“downstream end”:</i></b> “a portion of the conveyor segment at, close to, or adjacent the point where items to be conveyed leave the conveyor segment”</p> <p>“Downstream end” understood to optionally include a downstream edge.</p>	

Asserted Claims	TNA’s Proposed Construction	PPM’s Proposed Construction	Judge’s Construction
<p>3. The conveyor assembly of claim 2, wherein at least one of said segments is pivotally mounted so as to be movable in a generally horizontal plane to change the relative position of the first segment <i>downstream end</i> with respect to the second segment <i>upstream end</i> to thereby provide said lateral displacement.</p>	<p><b><i>“upstream end”:</i></b> No construction needed</p> <p><b><i>“downstream end”:</i></b> No construction needed</p>	<p><b><i>“upstream end”:</i></b> “a portion of the conveyor segment at, close to, or adjacent the point where items to be conveyed are introduced onto the conveyor segment”</p> <p>“Upstream end” understood to optionally include an upstream edge.</p> <p><b><i>“downstream end”:</i></b> “a portion of the conveyor segment at, close to, or adjacent the point where items to be conveyed leave the conveyor segment”</p> <p>“Downstream end” understood to optionally include a downstream edge.</p>	

Asserted Claims	TNA's Proposed Construction	PPM's Proposed Construction	Judge's Construction
4. The conveyor assembly of claim 1, wherein said segments are linear conveyors.			
5. The conveyor assembly of claim 4, wherein said first segment is pivotally moved in a generally horizontal plane relative to said second segment.			

Asserted Claims	TNA’s Proposed Construction	PPM’s Proposed Construction	Judge’s Construction
<p>6. A conveyor assembly including:</p> <p>a first slip conveyor segment having a longitudinally extending conveyor surface upon which items to be conveyed are longitudinally transported, the segment having an <i>upstream end</i> and a <i>downstream end</i>, the <i>upstream end</i> being provided to receive said item;</p> <p>a second slip conveyor segment, said second segment having a conveyor longitudinally extending surface upon which the items to be conveyed are longitudinally transported, the second segment having an <i>upstream end</i> and a <i>downstream end</i>, with said second segment being mounted relative to said first segment so that items leaving the first segment <i>downstream end</i> are delivered to the second segment <i>upstream end</i>,</p>	<p><b>“upstream end”:</b> No construction needed</p> <p><b>“downstream end”:</b> No construction needed</p> <p><b>“upstream end”:</b> No construction needed</p> <p><b>“downstream end”:</b> No construction needed</p>	<p><b>“upstream end”:</b> “a portion of the conveyor segment at, close to, or adjacent the point where items to be conveyed are introduced onto the conveyor segment”</p> <p>“Upstream end” understood to optionally include an upstream edge.</p> <p><b>“downstream end”:</b> “a portion of the conveyor segment at, close to, or adjacent the point where items to be conveyed leave the conveyor segment”</p> <p>“Downstream end” understood to optionally include a downstream edge.</p>	

Asserted Claims	TNA’s Proposed Construction	PPM’s Proposed Construction	Judge’s Construction
<p>said segments being mounted to provide for <i>lateral displacement between the first segment downstream end relative to the second segment upstream end</i> from an <i>aligned position at which a desired quantity of said items pass from said first segment to said second segment</i>, and a <i>displaced position at which a further desired quantity of said items is removed from said conveyor as a result of relative displacement between the first segment downstream end and the second segment upstream end</i>, with the first segment <i>downstream end</i> being located above the second segment <i>upstream end</i>; and</p>	<p><b>“lateral displacement ...”:</b>  “sideways displacement between the first segment downstream end relative to the second segment upstream end”</p> <p><b>“aligned position ...”:</b>  No construction needed</p> <p><b>“displaced position ...”:</b>  No construction needed, beyond construction of “relative displacement”</p> <p><b>“relative displacement ...”:</b>  “sideways displacement between the first segment downstream end relative to the second segment upstream end”</p> <p><b>“upstream end”:</b>  No construction needed</p> <p><b>“downstream end”:</b>  No construction needed</p>	<p><b>“lateral displacement ...”:</b>  “relative displacement between the first segment downstream end and the second segment upstream end in a sideways direction”</p> <p>“Lateral displacement” is understood to include movement by any number of means, where such lateral movement may be in combination with vertical movement</p> <p><b>“aligned position ...”:</b>  “where the first segment and second segment are arranged in agreement or proper orientation to move items from the first segment to the second segment”</p> <p>The term “aligned position” is not restricted to a parallel path.</p> <p><b>“displaced position ...”:</b>  “a position in which the first segment is not aligned with the second segment due to a change of one or both the</p>	



Asserted Claims	TNA’s Proposed Construction	PPM’s Proposed Construction	Judge’s Construction
		<p>position of the first segment and the second segment in relation to one another so that items, some or all, are moved off of the path from the first conveyor segment to second conveyor segment”</p> <p><b>“relative displacement ...”:</b>  “a change of one or both the position of the first segment and the second segment in relation to the other”</p> <p><b>“upstream end”:</b>  “a portion of the conveyor segment at, close to, or adjacent the point where items to be conveyed are introduced onto the conveyor segment”</p> <p>“Upstream end” understood to optionally include an upstream edge.</p> <p><b>“downstream end”:</b>  “a portion of the conveyor segment at, close to, or adjacent the point where items to be conveyed leave the conveyor segment”</p>	

Asserted Claims	TNA’s Proposed Construction	PPM’s Proposed Construction	Judge’s Construction
		“Downstream end” understood to optionally include a downstream edge.	

Asserted Claims	TNA’s Proposed Construction	PPM’s Proposed Construction	Judge’s Construction
<p>a <i>transverse conveyor positioned below</i> said first segment <i>downstream end</i> and said second segment <i>upstream end</i> so that items leaving said first segment <i>downstream end</i> and not delivered to said second segment <i>upstream end</i> are delivered to said <i>transverse conveyor</i>.</p>	<p><b>“transverse conveyor”:</b>  “conveyor that is situated across the first slip and second slip conveyor segments such that it is not substantially parallel to the first slip conveyor segment and the second slip conveyor segment”</p> <p><b>“positioned below”:</b>  “positioned beneath”</p> <p><b>“upstream end”:</b>  No construction needed</p> <p><b>“downstream end”:</b>  No construction needed</p>	<p><b>“transverse conveyor”:</b>  “a conveyor arranged such that it extends across at an angle, not in line with, the longitudinal transport direction of the first conveyor segment or the second conveyor segment”</p> <p>The term “transverse conveyor” includes offset or misaligned conveyors relative to the path of the first conveyor or second conveyor.</p> <p><b>“positioned below”:</b>  “positioned lower than or beneath”</p> <p><b>“upstream end”:</b>  “a portion of the conveyor segment at, close to, or adjacent the point where items to be conveyed are introduced onto the conveyor segment”</p> <p>“Upstream end” understood to optionally include an upstream edge.</p>	

Asserted Claims	TNA's Proposed Construction	PPM's Proposed Construction	Judge's Construction
		<p><b><i>“downstream end”:</i></b> “a portion of the conveyor segment at, close to, or adjacent the point where items to be conveyed leave the conveyor segment”</p> <p>“Downstream end” understood to optionally include a downstream edge.</p>	

Asserted Claims	TNA’s Proposed Construction	PPM’s Proposed Construction	Judge’s Construction
<p>7. The conveyor assembly of claim 6, wherein both conveyor surfaces are upwardly facing, and at least one of said segments is mounted for angular movement to provide for relative angular movement between the first segment <i>downstream end</i> and the second segment <i>upstream end</i>.</p>	<p><b><i>“upstream end”:</i></b> No construction needed</p> <p><b><i>“downstream end”:</i></b> No construction needed</p>	<p><b><i>“upstream end”:</i></b> “a portion of the conveyor segment at, close to, or adjacent the point where items to be conveyed are introduced onto the conveyor segment”</p> <p>“Upstream end” understood to optionally include an upstream edge.</p> <p><b><i>“downstream end”:</i></b> “a portion of the conveyor segment at, close to, or adjacent the point where items to be conveyed leave the conveyor segment”</p> <p>“Downstream end” understood to optionally include a downstream edge.</p>	

Asserted Claims	TNA’s Proposed Construction	PPM’s Proposed Construction	Judge’s Construction
<p>8. The conveyor assembly of claim 7, wherein at least one of said segments is pivotally mounted so as to be movable in a generally horizontal plane to change the relative position of the first segment <i>downstream end</i> with respect to the second segment <i>upstream end</i> to thereby provide said lateral displacement.</p>	<p><b><i>“upstream end”:</i></b> No construction needed</p> <p><b><i>“downstream end”:</i></b> No construction needed</p>	<p><b><i>“upstream end”:</i></b> “a portion of the conveyor segment at, close to, or adjacent the point where items to be conveyed are introduced onto the conveyor segment”</p> <p>“Upstream end” understood to optionally include an upstream edge.</p> <p><b><i>“downstream end”:</i></b> “a portion of the conveyor segment at, close to, or adjacent the point where items to be conveyed leave the conveyor segment”</p> <p>“Downstream end” understood to optionally include a downstream edge.</p>	

Asserted Claims	TNA's Proposed Construction	PPM's Proposed Construction	Judge's Construction
9. The conveyor assembly of claim 6, wherein said segments are linear conveyors.			
10. The conveyor assembly of claim 9, wherein said first segment is pivotally moved in a generally horizontal plane relative to said second segment.			

Asserted Claims	TNA’s Proposed Construction	PPM’s Proposed Construction	Judge’s Construction
<p>11. A conveyor assembly including:</p> <p>a first slip conveyor segment having a longitudinally extending conveyor surface upon which items to be conveyed are longitudinally transported, the segment having an <i>upstream end</i> and a <i>downstream end</i>, the <i>upstream end</i> being provided to receive said item;</p> <p>a second slip conveyor segment mounted on the base, said second segment having a conveyor longitudinally extending surface upon which the items to be conveyed are longitudinally transported, the second segment having an <i>upstream end</i> and a <i>downstream end</i>, with said second segment being mounted relative to said first segment so that items leaving the first segment <i>downstream end</i> are delivered to the second segment <i>upstream end</i>,</p>	<p><b>“upstream end”:</b> No construction needed</p> <p><b>“downstream end”:</b> No construction needed</p> <p><b>“upstream end”:</b> No construction needed</p> <p><b>“downstream end”:</b> No construction needed</p>	<p><b>“upstream end”:</b> “a portion of the conveyor segment at, close to, or adjacent the point where items to be conveyed are introduced onto the conveyor segment”</p> <p>“Upstream end” understood to optionally include an upstream edge.</p> <p><b>“downstream end”:</b> “a portion of the conveyor segment at, close to, or adjacent the point where items to be conveyed leave the conveyor segment”</p> <p>“Downstream end” understood to optionally include a downstream edge.</p>	



Asserted Claims	TNA’s Proposed Construction	PPM’s Proposed Construction	Judge’s Construction
<p>said segments being mounted to provide for <i>lateral displacement between the first segment downstream end relative to the second segment upstream end</i> from an <i>aligned position at which a desired quantity of said items pass from said first segment to said second segment</i>, and a <i>displaced position at which a further desired quantity of said items is removed from said conveyor as a result of relative displacement between the first segment downstream end and the second segment upstream end</i>, with at least one of said segments being pivotally mounted so as to be movable in a generally horizontal plane to change the relative position of the first segment <i>downstream end</i> with respect to the second segment <i>upstream end</i> to thereby provide said lateral displacement; and</p>	<p><b>“lateral displacement ...”:</b>  “sideways displacement between the first segment downstream end relative to the second segment upstream end”</p> <p><b>“aligned position ...”:</b>  No construction needed</p> <p><b>“displaced position ...”:</b>  No construction needed, beyond construction of “relative displacement”</p> <p><b>“relative displacement ...”:</b>  “sideways displacement between the first segment downstream end relative to the second segment upstream end”</p> <p><b>“upstream end”:</b>  No construction needed</p> <p><b>“downstream end”:</b>  No construction needed</p>	<p><b>“lateral displacement ...”:</b>  “relative displacement between the first segment downstream end and the second segment upstream end in a sideways direction”</p> <p>“Lateral displacement” is understood to include movement by any number of means, where such lateral movement may be in combination with vertical movement</p> <p><b>“aligned position ...”:</b>  “where the first segment and second segment are arranged in agreement or proper orientation to move items from the first segment to the second segment”</p> <p>The term “aligned position” is not restricted to a parallel path.</p> <p><b>“displaced position ...”:</b>  “a position in which the first segment is not aligned with the second segment due to a change of one or both the</p>	

Asserted Claims	TNA’s Proposed Construction	PPM’s Proposed Construction	Judge’s Construction
		<p>position of the first segment and the second segment in relation to one another so that items, some or all, are moved off of the path from the first conveyor segment to second conveyor segment”</p> <p><b>“relative displacement ...”:</b>  “a change of one or both the position of the first segment and the second segment in relation to the other”</p> <p><b>“upstream end”:</b>  “a portion of the conveyor segment at, close to, or adjacent the point where items to be conveyed are introduced onto the conveyor segment”</p> <p>“Upstream end” understood to optionally include an upstream edge.</p> <p><b>“downstream end”:</b>  “a portion of the conveyor segment at, close to, or adjacent the point where items to be conveyed leave the conveyor segment”</p>	

Asserted Claims	TNA's Proposed Construction	PPM's Proposed Construction	Judge's Construction
		<p>“Downstream end” understood to optionally include a downstream edge.</p>	

Asserted Claims	TNA’s Proposed Construction	PPM’s Proposed Construction	Judge’s Construction
<p>a <i>transverse conveyor positioned below</i> said first segment <i>downstream end</i> and said second segment <i>upstream end</i> so that items leaving said first segment <i>downstream end</i> and not delivered to said second segment <i>upstream end</i> are delivered to said <i>transverse conveyor</i>.</p>	<p><b>“transverse conveyor”:</b>  “conveyor that is situated across the first slip and second slip conveyor segments such that it is not substantially parallel to the first slip conveyor segment and the second slip conveyor segment”</p> <p><b>“positioned below”:</b>  “positioned beneath”</p> <p><b>“upstream end”:</b>  No construction needed</p> <p><b>“downstream end”:</b>  No construction needed</p>	<p><b>“transverse conveyor”:</b>  “a conveyor arranged such that it extends across at an angle, not in line with, the longitudinal transport direction of the first conveyor segment or the second conveyor segment”</p> <p>The term “transverse conveyor” includes offset or misaligned conveyors relative to the path of the first conveyor or second conveyor.</p> <p><b>“positioned below”:</b>  “positioned lower than or beneath”</p> <p><b>“upstream end”:</b>  “a portion of the conveyor segment at, close to, or adjacent the point where items to be conveyed are introduced onto the conveyor segment”</p> <p>“Upstream end” understood to optionally include an upstream edge.</p>	

Asserted Claims	TNA's Proposed Construction	PPM's Proposed Construction	Judge's Construction
		<p><b><i>“downstream end”:</i></b>  “a portion of the conveyor segment at, close to, or adjacent the point where items to be conveyed leave the conveyor segment”</p> <p>“Downstream end” understood to optionally include a downstream edge.</p>	

Asserted Claims	TNA’s Proposed Construction	PPM’s Proposed Construction	Judge’s Construction
<p>12. The conveyor assembly of claim 11, wherein both conveyor surfaces are upwardly facing, and at least one of said segments is mounted for angular movement to provide for relative angular movement between the first segment <i>downstream end</i> and the second segment <i>upstream end</i>.</p>	<p><b><i>“upstream end”:</i></b> No construction needed</p> <p><b><i>“downstream end”:</i></b> No construction needed</p>	<p><b><i>“upstream end”:</i></b> “a portion of the conveyor segment at, close to, or adjacent the point where items to be conveyed are introduced onto the conveyor segment”</p> <p>“Upstream end” understood to optionally include an upstream edge.</p> <p><b><i>“downstream end”:</i></b> “a portion of the conveyor segment at, close to, or adjacent the point where items to be conveyed leave the conveyor segment”</p> <p>“Downstream end” understood to optionally include a downstream edge.</p>	

Asserted Claims	TNA’s Proposed Construction	PPM’s Proposed Construction	Judge’s Construction
<p>13. The conveyor assembly of claim 12, wherein the first segment <i>downstream end</i> is located above the second segment <i>upstream end</i>.</p>	<p><b><i>“upstream end”:</i></b> No construction needed</p> <p><b><i>“downstream end”:</i></b> No construction needed</p>	<p><b><i>“upstream end”:</i></b> “a portion of the conveyor segment at, close to, or adjacent the point where items to be conveyed are introduced onto the conveyor segment”</p> <p>“Upstream end” understood to optionally include an upstream edge.</p> <p><b><i>“downstream end”:</i></b> “a portion of the conveyor segment at, close to, or adjacent the point where items to be conveyed leave the conveyor segment”</p> <p>“Downstream end” understood to optionally include a downstream edge.</p>	

Asserted Claims	TNA's Proposed Construction	PPM's Proposed Construction	Judge's Construction
14. The conveyor assembly of claim 13, wherein said segments are linear conveyors.			
15. The conveyor assembly of claim 14, wherein said first segment is pivotally moved in a generally horizontal plane relative to said second segment.			



Asserted Claims	TNA’s Proposed Construction	PPM’s Proposed Construction	Judge’s Construction
<p>16. A conveyor assembly including:</p> <p>a first slip conveyor segment having a longitudinally extending conveyor surface upon which items to be conveyed are longitudinally transported, the segment having an <i>upstream end</i> and a <i>downstream end</i>, the <i>upstream end</i> being provided to receive said item;</p> <p>a second slip conveyor segment, said second segment having a conveyor longitudinally extending surface upon which the items to be conveyed are longitudinally transported, the second segment having an <i>upstream end</i> and a <i>downstream end</i>, with said second segment being mounted relative to said first segment so that items leaving the first segment <i>downstream end</i> are delivered to the second segment <i>upstream end</i>,</p>	<p><b>“upstream end”:</b> No construction needed</p> <p><b>“downstream end”:</b> No construction needed</p> <p><b>“upstream end”:</b> No construction needed</p> <p><b>“downstream end”:</b> No construction needed</p>	<p><b>“upstream end”:</b> “a portion of the conveyor segment at, close to, or adjacent the point where items to be conveyed are introduced onto the conveyor segment”</p> <p>“Upstream end” understood to optionally include an upstream edge.</p> <p><b>“downstream end”:</b> “a portion of the conveyor segment at, close to, or adjacent the point where items to be conveyed leave the conveyor segment”</p> <p>“Downstream end” understood to optionally include a downstream edge.</p>	

Asserted Claims	TNA’s Proposed Construction	PPM’s Proposed Construction	Judge’s Construction
<p>said segments being mounted to provide for <i>lateral displacement between the first segment downstream end relative to the second segment upstream end</i> so that a desired quantity of said items pass from said first segment to said second segment, <i>with a further desired quantity of said items being removed from said conveyor as a result of relative displacement between the first segment downstream end and the second segment upstream end</i>; and</p>	<p><b>“lateral displacement ...”:</b>  “sideways displacement between the first segment downstream end relative to the second segment upstream end”</p> <p><b>“relative displacement ...”:</b>  “sideways displacement between the first segment downstream end relative to the second segment upstream end”</p>	<p><b>“lateral displacement ...”:</b>  “relative displacement between the first segment downstream end and the second segment upstream end in a sideways direction”</p> <p>“Lateral displacement” is understood to include movement by any number of means, where such lateral movement may be in combination with vertical movement</p> <p><b>“relative displacement ...”:</b>  “a change of one or both the position of the first segment and the second segment in relation to the other”</p>	

Asserted Claims	TNA’s Proposed Construction	PPM’s Proposed Construction	Judge’s Construction
<p>a <i>transverse conveyor positioned below</i> said first segment <i>downstream end</i> and said second segment <i>upstream end</i> so that items leaving said first segment <i>downstream end</i> and not delivered to said second segment <i>upstream end</i> are delivered to said <i>transverse conveyor</i>.</p>	<p><b>“transverse conveyor”:</b>  “conveyor that is situated across the first slip and second slip conveyor segments such that it is not substantially parallel to the first slip conveyor segment and the second slip conveyor segment”</p> <p><b>“positioned below”:</b>  “positioned beneath”</p> <p><b>“upstream end”:</b>  No construction needed</p> <p><b>“downstream end”:</b>  No construction needed</p>	<p><b>“transverse conveyor”:</b>  “a conveyor arranged such that it extends across at an angle, not in line with, the longitudinal transport direction of the first conveyor segment or the second conveyor segment”</p> <p>The term “transverse conveyor” includes offset or misaligned conveyors relative to the path of the first conveyor or second conveyor.</p> <p><b>“positioned below”:</b>  “positioned lower than or beneath”</p> <p><b>“upstream end”:</b>  “a portion of the conveyor segment at, close to, or adjacent the point where items to be conveyed are introduced onto the conveyor segment”</p> <p>“Upstream end” understood to optionally include an upstream edge.</p>	

Asserted Claims	TNA's Proposed Construction	PPM's Proposed Construction	Judge's Construction
		<p><b><i>“downstream end”:</i></b> “a portion of the conveyor segment at, close to, or adjacent the point where items to be conveyed leave the conveyor segment”</p> <p>“Downstream end” understood to optionally include a downstream edge.</p>	

Asserted Claims	TNA's Proposed Construction	PPM's Proposed Construction	Judge's Construction
<p>17. The conveyor assembly of claim 16, wherein both conveyor surfaces are upwardly facing, and at least one of said segments is mounted for angular movement to provide for relative angular movement between the first segment <i>downstream end</i> and the second segment <i>upstream end</i>.</p>	<p><b><i>“upstream end”:</i></b> No construction needed</p> <p><b><i>“downstream end”:</i></b> No construction needed</p>	<p><b><i>“upstream end”:</i></b> “a portion of the conveyor segment at, close to, or adjacent the point where items to be conveyed are introduced onto the conveyor segment”</p> <p>“Upstream end” understood to optionally include an upstream edge.</p> <p><b><i>“downstream end”:</i></b> “a portion of the conveyor segment at, close to, or adjacent the point where items to be conveyed leave the conveyor segment”</p> <p>“Downstream end” understood to optionally include a downstream edge.</p>	

Asserted Claims	TNA’s Proposed Construction	PPM’s Proposed Construction	Judge’s Construction
<p>18. The conveyor assembly of claim 17, wherein the first segment <i>downstream end</i> is located above the second segment <i>upstream end</i>.</p>	<p><b><i>“upstream end”:</i></b> No construction needed</p> <p><b><i>“downstream end”:</i></b> No construction needed</p>	<p><b><i>“upstream end”:</i></b> “a portion of the conveyor segment at, close to, or adjacent the point where items to be conveyed are introduced onto the conveyor segment”</p> <p>“Upstream end” understood to optionally include an upstream edge.</p> <p><b><i>“downstream end”:</i></b> “a portion of the conveyor segment at, close to, or adjacent the point where items to be conveyed leave the conveyor segment”</p> <p>“Downstream end” understood to optionally include a downstream edge.</p>	

Asserted Claims	TNA's Proposed Construction	PPM's Proposed Construction	Judge's Construction
<p>19. The conveyor assembly of claim 18, wherein at least one of said segments is pivotally mounted so as to be movable in a generally horizontal plane to change the relative position of the first segment <i>downstream end</i> with respect to the second segment <i>upstream end</i> to thereby provide said lateral displacement.</p>	<p><b><i>“upstream end”:</i></b> No construction needed</p> <p><b><i>“downstream end”:</i></b> No construction needed</p>	<p><b><i>“upstream end”:</i></b> “a portion of the conveyor segment at, close to, or adjacent the point where items to be conveyed are introduced onto the conveyor segment”</p> <p>“Upstream end” understood to optionally include an upstream edge.</p> <p><b><i>“downstream end”:</i></b> “a portion of the conveyor segment at, close to, or adjacent the point where items to be conveyed leave the conveyor segment”</p> <p>“Downstream end” understood to optionally include a downstream edge.</p>	

**CERTIFICATE OF SERVICE**

I certify that I served a true and correct copy of **JOINT CLAIM CONSTRUCTION CHART** on all counsel of record via the Court's ECF System on the 29<sup>th</sup> day of November, 2017.

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